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Security Council

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Letter dated 20 May 2003 from the Chairman of the Security Council Committee established pursuant to resolution 1132 (1997) concerning Sierra Leone addressed to the President of the Security Council

On behalf of the Security Council Committee established pursuant to resolution 1132 (1997) concerning Sierra Leone, I have the honour to convey herewith a letter dated 19 May 2003 from the Permanent Representative of Sierra Leone to the United Nations, forwarding the fifth review of the certificate of origin regime for the export of Sierra Leone diamonds as prepared by the Government of Sierra Leone in compliance with paragraph 2 of resolution 1306 (2000) (see annex).

The Committee would appreciate it if the annexed letter, together with its enclosure, could be brought to the attention of the members of the Security Council and issued as a document of the Security Council.

It should also be noted that the following related communications were issued previously: S/2000/966, S/2000/1151, S/2001/127, S/2001/300, S/2001/794, S/2002/38 and S/2002/826.

(*Signed*) Adolfo **Aguilar Zinser**
Chairman
Security Council Committee established pursuant
to resolution 1132 (1997) concerning Sierra Leone

03-36902 (E) 230503

Annex

Letter dated 19 May 2003 from the Permanent Representative of Sierra Leone to the United Nations addressed to the Chairman of the Security Council Committee established pursuant to resolution 1132 (1997) concerning Sierra Leone

I have the honour to submit herewith, on behalf of the Government of Sierra Leone, its fifth review of the certificate of origin regime for the export of rough and uncut diamonds from Sierra Leone, in accordance with resolution 1306 (2000).

(*Signed*) Joe Robert **Pemagbi**
Ambassador
Permanent Representative

Enclosure

Implementation of Security Council resolution 1306 (2000): fifth review of the certificate of origin regime for the export of Sierra Leone diamonds

I. Introduction

1. Since the last review of the operations of the Certificate of Origin pursuant to resolution 1306 (2000), the Government of Sierra Leone has provided the Security Council Committee established pursuant to resolution 1132 (1997), at the Committee's request, with supplementary information on issues related to the implementation of the Certificate of Origin regime. This included requests for clarification arising from allegations contained in the report of the Panel of Experts on Liberia.[1]

2. Also, since the last review the Government has provided the Committee with a report on an air patrol conducted in 2002 with logistical support by UNAMSIL over diamond mining areas in the Southern Province. Although it is not a requirement under resolution 1306 (2000), the Government also took the initiative to forward to the Committee another update on disbursements from its Diamond Mining Area Development Fund to local communities where diamonds are mined. As emphasized in the previous reviews, these disbursements are designed to help the chiefdoms in the reconstruction of roads, schools and community centres that were destroyed by the rebels. They also serve as incentives for curbing illicit mining, and as catalysts in the process of consolidating peace in those strategic parts of the country where the rebels plundered the diamonds and committed atrocities as well.

3. The series of communication between the Committee and the Government during the past several months were intended to supplement this the fifth periodic review of the Certification of Origin regime.

4. The Committee may also be interested to know that the Government also responded to a communication from the Chairman of the Liberia Sanctions Committee regarding alleged smuggling of rough diamonds from Liberia into Sierra Leone, as described in the same report of the Panel of Experts.

II. The extent of Government authority in diamond-producing areas

(i) The views of the Secretary-General and the Government

5. Last December, in resolution 1446 (2002), the Security Council welcomed the significant progress made in the peace process and improvements in the overall security situation in the country, including in the diamond-producing areas. It nevertheless emphasized that the Government of Sierra Leone should strengthen its efforts to extend its authority throughout the country, including the diamond-producing areas. The extent of Government's authority in the country as a whole has already been covered in the

Seventeenth Report of the Secretary-General on the United Nations Mission in Sierra Leone (UNAMSIL).[2] It is also reflected in the Aide Memoire from President Kabbah addressed to the Secretary-General two months ago, where specific reference was made to *inter alia*, the strength and capability of the Sierra Leone Police Force, and the mechanism already in place to coordinate implementation of the restoration and recovery processes nationwide.[3]

6. The Mines Office in Kono, which was burnt down by the rebels, has been rebuilt with funds from the Government of Sierra Leone and the UNDP. It is now fully operational. This has greatly enhanced the administration and supervision of the Mines Division of the Ministry of Mineral Resources in Kono. The Mines Office in Bo, in the Southern Province, and in Kenema in the Eastern Province, which had been in operation before the rebel war are now functioning. There is also a Mines Office in Makeni, in the Northern Province. It is temporarily housed in rented premises: Plans are already under way Plans are already under way to build a structure in Makeni similar to the one in Kono. Plans are also under way to open a branch office in Kamakwie, Northern Province. The Branch Office in Pujehun, in the Southern Province, is open and is already functioning.

7. The Government is pleased that the Secretary-General has taken note with satisfaction further progress made by the Government to restore its effective control over diamond mining, while stressing the importance of Government, in cooperation with its international partners, to step up efforts to fight illegal diamond mining and trade.

(ii) New alluvial diamond mining areas

8. Suffice it to say that in reviewing the progress made in the re-establishment of Government authority in the diamond-mining areas, the Committee should now take into account one of the most significant developments that has emerged in the diamond-mining sector since the last periodic review. This is action being taken in connection with the discovery of new areas of diamond mining in another part of the country, the Northern Province. Thousands of unemployed individuals have been streaming into those areas. As former United States Ambassador to Sierra Leone, John H. Melrose observed last year, the presence of alluvial diamonds creates conditions for such influx of fortune seekers. Under these circumstances, he added, digging for diamonds takes place over wide geographical areas making it particularly difficult to control.[4] According to the Secretary-General, in some areas youth groups are seeking to exercise de facto control over mining, in defiance of state authority. These observations underscore the problems of trying to establish and maintain absolute control of alluvial diamond deposits.

9. The discovery of the new alluvial areas has obviously impacted on the capacity of the Government to effectively manage illicit mining. Accordingly, it has re-deployed Mine Wardens to the new areas to undertake proper demarcation of mining plots before issuing licences.

(iii) Kimberlite mining and security in diamond mining areas

10. Another major development since the last review of the Certification regime is the exploitation of kimberlite deposits. As is well known, kimberlite mining is much easier to control than alluvial or artisanal mining. A private company, Branch Energy Limited, has started operations at Koidu, Kono, to exploit the kimberlite deposits within its leased area. These operations do not create the security problems usually encountered in alluvial operations. The entire leased area, about 1000 acres, is completely fenced off and made inaccessible to potential illicit miners. Production of kimberlite diamonds is expected to begin in September or October 2003.

(iv) The role of UNAMSIL

11. UNAMSIL continues to play a major role in ensuring that a peaceful atmosphere prevails in the process of re-establishing full civilian administration in the areas. Specifically, it cooperates with the Ministry of Mineral Resources in the organization of joint patrols to locate pockets of suspected illicit mining. It is hoped that this cooperation will continue, and that as the Secretary-General reported, UNAMSIL could further assist the Government in curbing illicit mining using military observers, "to determine the global positioning system coordinates of each of the licenced plots leased for artisanal mining."

III. Marketing

(i) Certificate of Origin under resolution 1306 (2000)

12. The progress achieved in Government control of the diamond-mining areas, a development that the Panel of Experts on Liberia has acknowledged, is reflected in increasing legal mining activity and trade, as well as in the quality and quantity of diamonds exported through the Certificate of Origin system. Mine officials continue to ensure that diamonds won from licenced mining areas are sold to licenced dealers or exporters in strict compliance with resolution 1306 (2000).

13. As of the end of April 2003, a total of 153,292 carats valued at US$ 23.9 million has been exported through the Government Gold and Diamond Office (GDDO), as compared with 76,291 carats valued at US$ 8.6 million, and 63,366 carats valued at US$ 8.2 for the same period in 2002 and 2001 respectively. As predicted, the total export in 2002 was US$ 41.7 million. To date, five hundred and ninety-nine (599) new certificates of origin have been issued -- about 95% by value exported to Belgium, 1.6% by value to Israel, 1.7 by value to the United Kingdom, and 1% by value to the United States. These are the significant countries of destination. (See attached tables showing exports since the Certification of Origin came into effect in October 2000, and the destination of diamonds from Sierra Leone.)

(ii) International certificate system under the Kimberley Process

14. The Government of Sierra Leone is an active participant in the Kimberley Process. It was one of the 35 countries that instituted the Process formally on 1 January 2003. It is apparent from the US$ 23.9 million worth of diamonds legally exported during the first four months of the start of the implementation of the Process, that Kimberley has also had a positive impact on the marketing of rough diamonds from Sierra Leone. As the UN General Assembly has recognized, the Kimberley Process can help to ensure the effective implementation of relevant resolutions of the Security Council containing sanctions on the trade in conflict diamonds. If the current trend continues the projected value of Sierra Leone's export for 2003 could range from US$ 65 million to US $70 million.

IV. National and international certificate regimes and diamond smuggling

15. Like the Kimberley Process Certification Scheme, the principal objective of the Certificate of Origin for Sierra Leone diamonds, under resolution 1306 (2000), is to substantially reduce the opportunity for diamonds to play a role in fuelling armed conflict while helping to protect the legitimate trade in diamonds. The Government of Sierra Leone continues to share the view that the systems of control which are necessary to reduce or even to eliminate conflict diamonds, as well as the age-old phenomenon of diamond smuggling, should not be limited to the production side. It should cover the entire chain of production and export, import and re-export of rough diamonds.

16. The Government of Sierra Leone concerned over assertions that a considerable amount of diamonds produced in Sierra Leone is smuggled. It is also concerned that specific dollar amounts are being quoted and attached to such illicit trade. Of course, the Government acknowledges its responsibility to take all necessary measures, including strict control, surveillance and monitoring in the diamond-mining areas and the rest of the production/export chain, to curb smuggling. However, responsibility for the 'guesstimated' value of smuggled diamonds lies not only on Sierra Leone, a producing country, which has relatively limited control capability, but more so on importing countries that have sophisticated control mechanisms at their disposal to curb the trade in illicit diamonds.

17. An important conclusion one can draw from such quotations for diamonds allegedly smuggled from Sierra Leone is that the measures contained in paragraph 1 of resolution 1306 (2000) are being violated. In other words, persons and entities outside Sierra Leone continue to buy its diamonds illegally in violation of the resolution and the Government's Certificate of Origin regime.

18. It is most unfortunate that notwithstanding the documented large increase in the quantity and value of diamonds exported through the Certificate of Origin regime, so much attention is being focused on a 'guesstimated' quantity and value of Sierra Leone diamonds that reportedly reach the international market illegally. The Government finds inexplicable the argument that its documented increase in legal diamond exports would

not necessarily result in a decrease of illegal exports, since an overall increase in production could lead to an increase in both legal and illegal diamond exports.

19. As far as the Government is concerned, the marked increase in the value of diamonds exported through the Certificate of Origin regime is commendable and encouraging. The Security Council itself has acknowledged the significance of the positive results of the regime. This development should not be downplayed or submerged under the 'guesstimated' and inaccurate data on illegal exports and re-exports. In this connection it should be recalled that the General Assembly, while expressing concern at the role of illegal diamonds in fuelling conflict, and while recognizing the imperative of taking urgent action to curb the trade in conflict diamonds, has repeatedly noted that the vast majority of rough diamonds produced in the world are from legitimate sources. In should be recalled that in resolution 1306(2000) the Security Council emphasized that nothing in the resolution is intended to undermine the legitimate diamond trade and diminish confidence in the integrity of the legitimate diamond industry.

20. The Security Council recently re-emphasized the responsibility of all States, including the diamond importing countries, for fully implementing the measures prohibited in the resolution. In this connection, the Government of Sierra Leone has welcomed the action taken by the Gambian judiciary last year, to prosecute a Belgian and a Sierra Leonean for illegally dealing in Sierra Leone diamonds.[5] The Government of Sierra Leone has reported to the Committee two cases, one involving a Ukrainian and the other a German national, of diamond smuggling. The individuals were apprehended, fined and later deported. The diamonds were confiscated. A suspected ring of illicit dealers and smugglers in the Kenema area is under investigation.

21. Since Belgium accounts for 90% of diamonds exported from Sierra Leone, the Government of Sierra Leone also notes with interest that tightening of demands for certification by Belgian authorities have encouraged a number of known and long-standing smugglers to legalize their transactions by requesting certification.[6] This augurs well for full implementation of resolution 1306 (2000).

22. In March 2003, the Minister of Mineral Resources paid a working visit to the Belgian Ministry of Economic Affairs to discuss issues related to implementation of the Certificate of Origin regime, including clarification of queries that had been reported to the Committee. Both sides agreed to cooperate and remain in close contact to ensure the proper functioning of the regime.

V. Notification of imports from Sierra Leone

23. All along, and as part of the effort to strengthen the regime, Sierra Leone had advocated that countries without the electronic recording and confirmation system should send their import confirmation certificates to the HRD in Belgium for onward transmission to the Government Gold and Diamond Office (GDDO) in Sierra Leone. In this way, Sierra Leone could also keep tract of its exports. The reporting countries could also keep track of their legal import of rough diamonds from Sierra Leone. With the new

Kimberley Process Certification System in place the reporting procedure for Sierra Leone diamonds has been significantly enhanced. The publication of latest statistics from Belgium would show the amount of diamonds from Sierra Leone that was accompanied by valid certificates.

VI. The Mining Community Development Fund

24. With the increase in diamond exports, the Committee would be interested to know that the Diamond Area Community Development Fund (DACDF) continues to have a significant impact on the lives of communities affected by diamond-mining. In addition to the funds derived directly from the number of licences issued in each Chiefdom, the UNDP has agreed to assist in the completion of on-going projects initiated by the communities themselves.

VII. Diamond mining policy

25. Although the adoption and implementation of new policies and strategies for its diamond mining sector are not, strictly speaking, the subject of resolution 1306 (2000) other than the requirement that it sets up an effective Certification regime for its diamonds and re-establish control over the diamond mining areas, the Government has taken the initiative to share with the Committee information on relevant policy matters. It should be noted that since the colonial days Sierra Leone has had diamond mining policies that have been amended or modified as and when necessary. For instance, the 1956 Alluvial Diamond Mining Ordinance, which did not apply to the licence held by the Sierra Leone Selection Trust (SLST), paved the way for indigenous participation in diamond production. It has been modified to ensure that the country stays abreast with best practices, and in its own interest. After independence the emphasis was to ensure participation by Sierra Leoneans in what had become a lucrative diamond mining industry. Since 1970 when the Government acquired 51 per cent shares in the Sierra Leone Selection Trust and established the National Diamond Mining Company (NDMC), there have been several modifications and new provisions in Government's policy strategy.

26. The current policy is the 1996 Mines and Minerals Act, which was initially passed as Decree No. 5 by the NPRC military regime in 1994. The Act encapsulates all changes made since 1970. The document was prepared with the assistance of the World Bank.

27. In short, by 1970 the licensing of alluvial diamond mining had become a norm. Thousands of licences were issued, especially in the Southern and Eastern Provinces. This control system was virtually destroyed by the rebel war, starting in 1991. As a result illicit mining became the order of the day. With the end of the war, the situation has changed for the better.

28. However, the Government is currently considering a number of policy options that could further improve the current trend. As the Secretary-General has reported to the Security Council, the Government and the World Bank have already undertaken a comprehensive study including recommendations for the development of the diamond-mining sector. The two recent diamond mining policy workshops sponsored by the UK Department for International Development (DfiD), and the World Bank which, among other things examined policy options in the diamond industry, and key issues in the whole mining industry, also reflect Government's commitment to strengthen its ability to play the leading role in the effective exploitation and marketing of its alluvial and kimberlite diamonds and other mineral resources.

29. Of course, national strategies for the management of such a complex industry cannot be adopted and implemented overnight. With the assistance and cooperation of the international community, especially the States and entities that import Sierra Leone diamonds, the Government will continue to give serious attention to the rational exploitation of its diamonds, as well as other mineral resources, for the benefit of its people. As the Sierra Leone delegation to the recent session of the UN Commission on Human Rights stated in emphasizing the need for international cooperation and assistance, Sierra Leone produces beautiful high quality diamonds. However, when a Sierra Leonean man wants to give his fiancée a diamond engagement ring he has to import the ring from abroad.

VIII. Conclusion

30. Security Council resolution 1306 (2000) and the Certificate of Origin for rough and uncut diamonds from Sierra Leone established under the resolution have made a remarkable contribution to the post-war development programmes of the country. With the end of the rebel war, the successful completion of the disarmament and demobilization of ex-combatants, the gradual but consistently determined effort by the Government not only to establish absolute physical control of all current and prospective alluvial diamond mining areas -- an obviously daunting task, giving the nature of alluvial deposits -- but also to discourage illicit mining, there is no doubt that the Certificate of Origin regime is achieving its primary objective.

31. Resolution 1306 (2000) was never intended as a punitive measure or sanctions against Sierra Leone. Indeed, rough diamonds controlled by the Government through the Certificate of Origin regime are exempt from the measures imposed in paragraph 1 of the resolution. The resolution was intended to assist Sierra Leone on the basis of the Council's "concern at the role played by the illicit trade in diamonds in fuelling the [rebel] conflict in Sierra Leone, and at reports that such diamonds transit neighbouring countries, including Liberia." For this, the Government is grateful to the Security Council and the international community.

32. Liberia is yet to establish a credible, effective, and internationally verifiable Certificate of Origin regime for its diamonds. However, there are no longer reports of

uncertified Sierra Leonean diamonds transiting through the territory of Liberia. The Panel of Experts on Liberia reports that the imposition of sanctions against Liberia and the progress in the Sierra Leone peace process have resulted in the disappearance of Liberian-labelled rough diamonds from the international market. As the Committee is aware, some of those Liberian-labelled diamonds were in fact Sierra Leonean diamonds smuggled into Liberia, especially by the RUF rebels during the eleven-year rebel war.

33. The effectiveness of the Sierra Leone Certificate of Origin regime, and incidentally that of neighbouring Guinea, has been further strengthened by the establishment of the Kimberley Process Certification Scheme. Both the Security Council and the General Assembly have stressed that widest possible participation in the Scheme is essential and should be encouraged and facilitated.

34. The Sierra Leone Certificate of Origin regime is fully compatible with the Kimberley Process Certification Scheme. The prospects for its further success depends far less on the incidence of illicit mining and smuggling of Sierra Leone diamonds than on faithful adherence by all participants to their responsibilities and obligations under the global Scheme.

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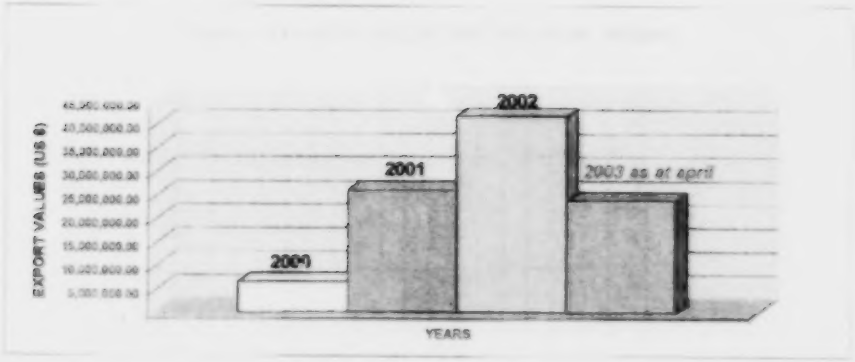
[1] S/2002/1115
[2] S/2003/321
[3] S/2003/330
[4] Testimony before US Senate Committee on Government Affairs, Sub-Committee on Oversight of Government Management Quoted in The Sierra Leone Web, www.sierra-leone.org 13 February 2002
[5] S/2002/152, and its Annex
[6] S/2002/1115

GOVERNMENT GOLD AND DIAMOND OFFICE - SIERRA LEONE

DIAMOND EXPORTS UNDER CERTIFICATION REGIME

	YEAR	MONTHS	TOTAL CARATS	SUBTOTAL CARATS	VALUES ($)	SUBTOTAL VALUES	PRICE/CARAT
01		OCTOBER	28,450.60	28,450.60	4,470,424.41	4,470,424.41	157.13
02	2000	NOVEMBER	12,128.75	40,579.35	1,079,696.69	5,550,119.98	89.02
03		DECEMBER	9,702.16	50,281.51	983,014.69	6,533,134.69	129.93
04		JANUARY	13,496.10	13,496.10	1,991,773.84	1,991,773.84	147.59
05		FEBRUARY	15,384.67	28,870.77	1,909,276.29	3,901,050.13	124.16
06		MARCH	20,055.63	48,926.40	2,606,334.87	6,506,386.00	133.89
07		APRIL	14,440.88	63,366.98	1,821,327.48	8,407,712.48	126.13
08		MAY	16,996.96	80,363.94	2,156,765.69	10,564,477.48	126.89
09	2001	JUNE	15,652.29	96,016.23	2,154,917.36	12,719,394.84	137.67
10		JULY	18,161.11	114,177.34	2,154,666.90	14,874,063.74	118.64
11		AUGUST	16,589.67	130,767.01	2,280,402.42	17,154,466.16	138.13
12		SEPTEMBER	29,706.68	160,393.69	2,194,349.36	19,348,815.52	73.87
13		OCTOBER	24,097.92	184,491.61	2,488,445.48	21,837,260.98	103.25
14		NOVEMBER	21,358.88	205,850.49	2,182,822.96	23,989,783.93	100.79
15		DECEMBER	16,668.34	222,519.83	2,032,708.34	26,022,492.27	116.34
16		JANUARY	20,696.75	20,696.75	1,436,666.60	1,436,666.60	69.77
17		FEBRUARY	16,968.69	37,676.39	1,782,846.79	3,219,418.23	184.94
18		MARCH	13,290.94	51,166.34	1,690,819.80	4,910,237.73	119.78
19		APRIL	25,761.72	76,921.96	3,772,799.35	8,683,696.68	146.46
20		MAY	29,781.27	106,703.23	3,241,963.81	11,924,949.89	109.56
21	2002	JUNE	29,868.43	136,563.66	4,196,749.43	16,821,699.32	141.49
22		JULY	37,479.73	173,843.39	4,820,999.11	20,942,698.43	131.25
23		AUGUST	32,250.28	206,093.67	4,911,932.82	25,854,426.98	133.76
24		SEPTEMBER	49,460.13	255,553.80	5,295,133.48	35,919,694.36	106.48
25		OCTOBER	29,449.96	285,063.76	3,770,189.08	34,289,743.44	128.02
26		NOVEMBER	33,096.79	318,160.54	3,783,678.08	38,943,822.44	111.41
27		DECEMBER	33,168.69	351,889.23	3,698,397.83	41,732,130.30	118.96
28		JANUARY	37,992.59	37,992.59	4,912,174.44	4,912,174.44	121.84
29	2003	FEBRUARY	40,612.74	78,446.73	7,927,005.08	11,889,179.62	149.10
30		MARCH	29,886.79	108,092.62	4,937,397.46	16,826,896.98	152.98
31		APRIL	45,269.98	153,292.40	7,363,137.98	23,989,874.96	156.04
		TOTAL	777,962.97		98,177,432.12		126.20



GOVERNMENT GOLD AND DIAMOND OFFICE
DIAMOND EXPORTS UNDER CERTIFICATION REGIME

2002 - 2003 - as at 12 May, 2003

DESTINATION	NO.CERT	CARATAGE	VALUE
BELGIUM	439	773,362.78	94,897,624.00
CANCELLED	36		
CANADA	1	84.82	14,000.00
GERMANY	4	501.92	68,300.00
GREECE	1	116.94	10,592.70
HOLLAND	1	25.36	10,397.60
INDIA	1	221.27	12,522.74
ISRAEL	16	5,455.72	1,612,597.53
ITALY	1	156.02	28,102.32
CHINA	1	43.55	35,670.00
SOUTH AFRICA	1	26.61	13,536.91
SWEDEN	1	7.46	3,776.61
SWITZERLAND	1	20.70	4,500.00
UK	33	4,183.51	1,040,633.74
UKRAINE	2	60.15	43,209.83
USA	46	3,780.68	1,722,975.83
SUBTOTAL	**585**	**788,047.49**	**99,518,439.81**
OTHERS	**14**	**1,181.81**	**306,151.04**
TOTALS	**599**	**789,229.30**	**99,824,590.85**

DIAMOND EXPORTS UNDER CERTIFICATION REGIME

	2000			2001			2002			2003		
DESTINATION	NO. CERT	CARATS	VALUE ($)	NO. CERT	CARATS	VALUE ($)	NO. CERT	CARATS	VALUE ($)	NO. CERT	CARATS	VALUE ($)
BELGIUM	26	50,126.12	6,458,577.59	114	211,289.19	23,121,883.93	195	349,188.54	40,827,307.16	104	162,758.93	24,489,855.32
CANCELLED	3			16			14			3		
CANADA				1	84.82	14,000.00						
GERMANY				4	501.92	68,300.00						
GREECE				1	116.94	10,592.70						
HOLLAND				1	25.36	10,397.80						
INDIA				1	221.27	12,522.74						
ISRAEL				7	4,146.52	1,232,652.21	6	1,148.49	280,571.48	3	160.71	99,373.84
ITALY				1	156.02	26,102.32						
SOUTH AFRICA							1	26.61	13,536.91			
SWEDEN							1	7.46	3,776.61			
SWITZERLAND							1	20.70	4,500.00			
UK.	2	135.61	64,057.00	13	3,167.01	627,332.28	12	388.19	146,511.36	6	492.50	202,733.10
UKRAINE				1	58.76	41,559.83				1	3.39	1,650.00
USA				20	2,246.15	754,624.55	15	533.54	265,170.59	11	1,000.99	703,160.69
CHINA				1	43.55	35.67						
TOTAL	32	50,261.61	6,533,134.59	183	222,619.83	26,022,627.94	254	351,889.23	41,732,136.39	138	164,568.73	25,536,833.69